

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SECTRA COMMUNICATIONS AB,
Plaintiff,
v.
ABSOLUTE SOFTWARE, INC. and
NETMOTION SOFTWARE, INC.,
Defendants.

Case No. 2:22-cv-0353-RSM

**STIPULATION AND ORDER
REGARDING JURISDICTIONAL
DISCOVERY DEADLINES**

**NOTE ON MOTION CALENDAR:
JANUARY 20, 2023**

1 The parties to the above-captioned action (the “Parties”), submit the below stipulation
 2 pursuant to Local Civil Rule 7(*l*) for review and approval by the Court:

3 **WHEREAS**, the Parties have engaged in good-faith meet-and-confer discussions
 4 regarding deadlines for jurisdictional discovery in connection with the Court’s order (Dkt. No.
 5 130) granting Defendant NetMotion Software Inc.’s (“NetMotion”) Motion in the Alternative to
 6 Seek Jurisdictional Discovery (Dkt. No. 109) (the “Motion for Jurisdictional Discovery”), and
 7 have reached mutual agreement on a schedule for jurisdictional discovery and remaining briefing
 8 on NetMotion’s Motion for Leave to Amend Counterclaim (Dkt. No. 99) (the “Motion for Leave”);

9 **WHEREAS**, the Court has granted (Dkt. No. 130) Netmotion’s Motion for Jurisdictional
 10 Discovery (Dkt. No. 109);

11 **WHEREAS**, NetMotion has served its first set of requests for production of documents
 12 regarding jurisdictional issues and its first set of interrogatories regarding jurisdictional issues on
 13 Columbitech on January 11, 2023.

14 **WHEREAS**, to allow adequate time for Columbitech to respond to NetMotion’s first set
 15 of interrogatories regarding jurisdictional issues, the Parties have agreed that the deadline for
 16 Columbitech to respond should be February 10, 2023;

17 **WHEREAS**, to allow adequate time for Columbitech to complete document production in
 18 response to NetMotion’s first set of requests for production of documents regarding jurisdictional
 19 issues, the Parties have agreed that the deadline for Columbitech to complete document production
 20 regarding jurisdictional issues should be February 28, 2023;

21 **WHEREAS**, the Parties have agreed that Mr. Englund’s deposition and the 30(b)(6)
 22 deposition of Columbitech should be held between March 13, 2023 and March 22, 2023;

23 **WHEREAS**, to allow for adequate time to complete jurisdictional discovery, the Parties
 24 have agreed that the close of jurisdictional discovery should be March 22, 2023;

25 **WHEREAS**, Mr. Englund’s deposition and jurisdictional discovery may be relevant to
 26 NetMotion’s pending Motion for Leave; and

1 **WHEREAS**, to address any relevance of jurisdictional discovery and any deposition on
2 NetMotion's Motion for Leave, the Parties have agreed that, consistent with the Court's order
3 granting NetMotion's Motion for Jurisdictional Discovery, the deadline for NetMotion's
4 supplemental reply brief in support of the Motion for Leave should be extended further to April 5,
5 2023, and the deadline for Sectra and Columbitech's sur-reply brief in opposition to the Motion
6 for Leave should be extended further to April 19, 2023.

7 **THEREFORE**, the Parties hereby **STIPULATE** that the deadline for Columbitech's
8 responses to NetMotion's interrogatories should be February 10, 2023; that the deadline for
9 Columbitech's document production should be February 28, 2023; that depositions should be held
10 between March 13, 2023, and March 22, 2023; that the close of jurisdictional discovery should be
11 March 22, 2023; that the deadline for NetMotion's supplemental reply brief in support of the
12 motion for leave to amend be extended to April 5, 2023; and that the deadline for Sectra and
13 Columbitech's sur-reply brief be extended to April 19, 2023;

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15 **SO STIPULATED.**

16 DATED this 20th day of January, 2023
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Respectfully submitted,

COOLEY LLP

/s/ Christopher B. Durbin

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IT IS SO ORDERED.

DATED this 23rd day of January, 2023.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE